

**Electromagnetic Safety Alliance, Inc.
3031 N. Gaia Place
Tucson, Arizona 85745**

December 27, 2016

To: Federal Communications Commission

Re: Comments on FCC Docket No. 16-399. Proposal to discontinuing the Local Exchange, DSL and Voice service through landlines

Dear Sir/Madam,

I am strongly opposed to this proposal that would authorize discontinuing the Local Exchange, DSL and Voice service through landlines in about 22 states in the United States. My chief concern is that many people, who prefer to continue using land line services, would be left behind. The telephone provides an important communications service that promotes human connectivity and provides public safety in many ways. The availability of the telephone can save lives, helps build community, foster ongoing relationships among family and friends and, is a convenient way to conduct business, place orders or, call a repair person. People who are home bound, who suffer from chronic illnesses or disabling conditions, rely on the telephone to connect them to others.

Wireless communications technologies are being promoted as the way of the future. Yet, there are serious concerns about adverse health effects that can result due to exposure to radiofrequency radiation (RFR), which is harnessed to transmit wireless communications signals. Some people prefer to continue using landlines in their homes and also own a cell phone that they use when they travel. Some people suffer moderate or severe reactions to the radiofrequency signals and must limit or completely avoid using wireless communications technologies to protect their health. I own a smart phone but I only use it when I am away from home, for short call or in time of emergency. I much prefer to use my land line phone at home for health and privacy reasons.

It is estimated that about 4% of the population suffers from electrically hypersensitivity, also known as radiofrequency radiation sickness, to a severe degree: another 30% of the population suffer from electro-hypersensitivity or radiofrequency radiation sickness, to a moderate degree. People who have this condition can become functionally impaired to the point that they are disabled and are then unable to be a productive member of society or, to care for their families. I am moderately electrically hypersensitive and seek to reduce or eliminate EMF sources in my home in order to protect my health and well-being.

The telecommunications/government partnership has set goals that entail dropping landlines, and its long-term plans are to only offering wireless internet based services in the future. These goals are unrealistic as it does not consider the negative impact on millions of American who do not want to go

wireless for personal health or privacy reasons or, or because they affirmatively prefer to reduce or eliminate exposure to radiofrequency radiation as a precautionary measure.

Step by step, as decisions are made on this proposal and others like it to come, the population will become chronically exposed to harmful electrosmog conditions and it will be almost impossible to avoid these exposures. More and more people will have no choice but to be left behind.

What are the millions of Americans, who may be cut off from all communications, if this proposal were approved, supposed to do? Are the economic benefits that will accrue to a few worth the social dislocations and catastrophic conditions that will impact the entire population? Landlines are an important communications tool and should continue to be made available as an option to all who request it, with no additional charges or fees.

There is a robust and growing body of scientific evidence that supports the view that electromagnetic radiation in the radiofrequency/microwave bands of the EMF spectrum is potentially a toxic agent and can cause disabling sensitivity reactions, infertility, cancers and neurological diseases.

I am a signatory to the International EMF Scientist Appeal to the United Nations. This Appeal was initiated in 2015 and now has been signed by 223 scientists in 41 nations. All signators have published EMF studies in peer reviewed science journals. The Appeal urgently calls for the UN to investigate the scientific evidence that demonstrates harm to humankind and nature under exposure conditions that are far below the guidelines set by the FCC and by the international guidelines endorsed by the World Health Organization EMF Project. The Appeal specifically identifies Wi-Fi and cell phones as key examples of the wireless communications devices and networks that pose serious health risks to people, including those who suffer from electro-hypersensitivity. See www.emfscientist.org.

In the summer of 2016, Dr. Magda Havas, PhD, an environmental scientist, EMF researcher, and a professor at Trent University in Canada, was invited to make a presentation at the U.S National Institute of Environmental Health Sciences on electrosmog and electrical hypersensitivity. See this 15 minute presentation by clicking here:

<https://www.bing.com/videos/search?q=magda+havas+presentation+to+NIEHS&view=detail&mid=F9581A036EFAC12013D9F9581A036EFAC12013D9&FORM=VIRE>

Dr. Havas just published a paper entitled, "When theory and observation collide: Can non-ionizing radiation cause cancer?" where she discusses the fundamental flaws that are made in setting radiofrequency radiation (RFR) exposure guidelines that are based on avoiding thermal heating effects. complete paper is at <http://www.sciencedirect.com/science/article/pii/S0269749116309526>.

Most importantly, in May of 2016, the U.S. National Toxicology Program (NTP), an agency under the NIH's National Institute of Environmental Health Sciences, provided an early release of partial findings of a well-executed \$25 million dollar study it has been conducting on rats and mice exposed to radiofrequency radiation (RFR). The exposure conditions to RFR were intentionally comparable to the exposure conditions to RFR from wireless communications technologies people commonly are exposed to today from cell phones and other wireless devices. These reported findings have

demonstrated a causal relationship exists between RFR exposure and glioma, a malignant brain tumor and, a schwannoma cell tumor in the heart, this according to the NTP scientists who managed the study. The chief epidemiologist of the American Cancer Society immediately called these findings a “gamechanger.” The full report will not be released for another year, but this U.S. government report should nonetheless serve as an authoritative wake-up call to the population and to the telecommunications industry – the message is ---wireless technology is capable of causing biological harm!

Please consider my heartfelt plea and do not approve this proposal to proceed to landline phone services in these states. When AT&T tried to get legislation passed in California a few months ago to dismantle landline phone services in that state, the bill did not pass due to opposition to it, including opposition by the California Public Utility Commission. So, now the federal government has resorted to exerting its influence to achieve the same goal of dismantling landline phone services expeditiously and to save the telecommunications carriers from having to seek approval state by state to dismantle landline services.

The FCC is not a health agency and while it gives lip service to the idea of deferring to the Food and Drug Administration and the other federal health agencies on health and science matters, it is well documented that, when it adopted revisions to the RFR human exposure guidelines in 1997, FCC ignored the concerns raised by the cognizant federal health agencies about the adequacy of those guidelines to protect workers and the general public from harm.

It is well known that the telecommunications corporations exert strong influence over public policy decision-making, but these are politically and economically motivated decisions and are not decisions that consider the health and well-being of the population into account. If the FCC continues down this path, by ignoring credible scientific evidence that shows there is biological harm under the current RFR human exposure guidelines, it would be behaving recklessly. Giving Century Link the “green light” is ill-advised as there will be major consequences on the health and well-being of millions of Americans.

I want to underscore that the telecommunications industry must be held to account to continue to provide land line services that ensures everyone has equal access, wired or wireless, and no one is left behind. This is the right thing to do.

Sincerely,

Elizabeth A. Kelley, MA
Director
Electromagnetic Safety Alliance, Inc.

Email: lkelly_45@msn.com

